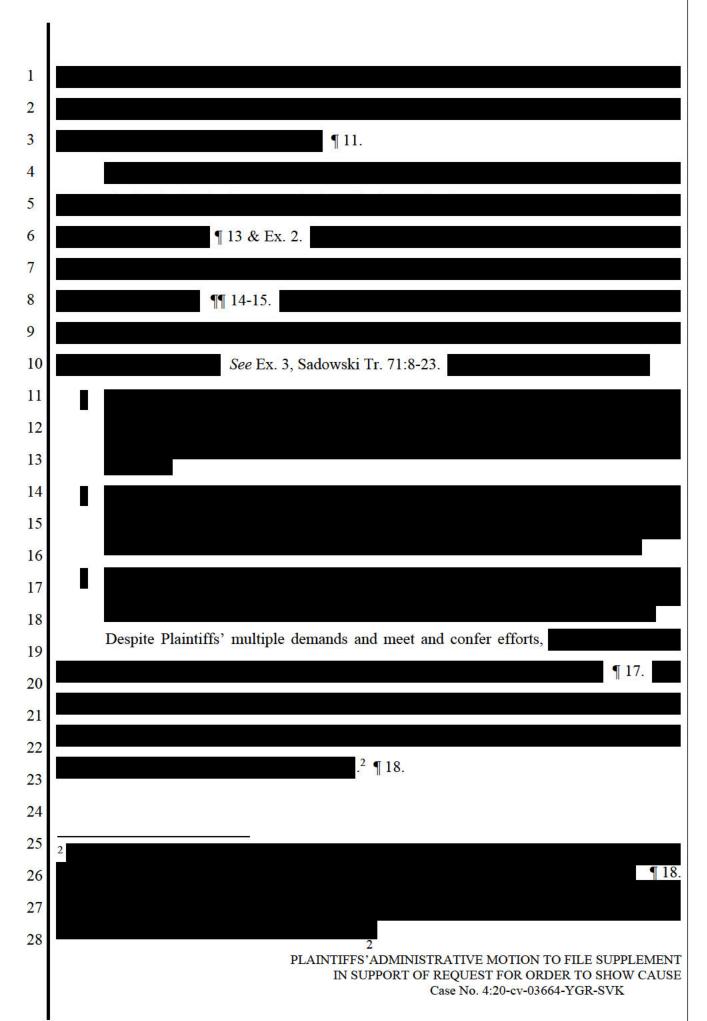
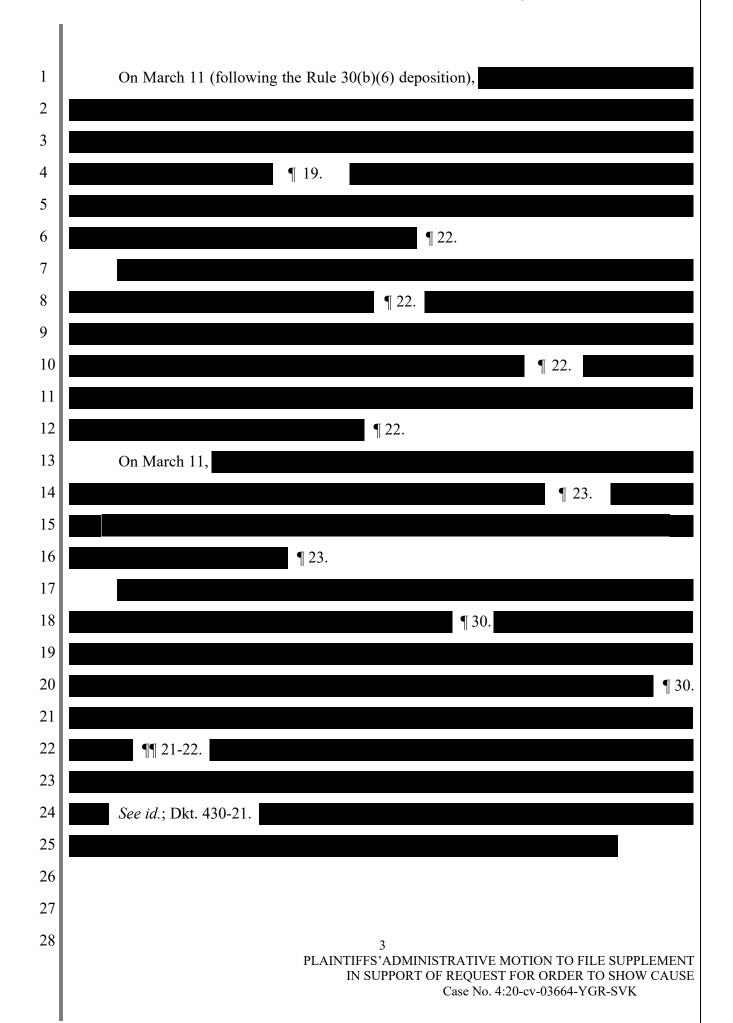
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19	NORTHERN DISTRICT OF CALIFORNIA		
20	CHASOM BROWN, WILLIAM BYATT,	Case No.: 4:20-cv-03664-YGR-SVK	
2.1	JEREMY DAVIS, CHRISTOPHER		
21	CASTILLO, and MONIQUE TRUJILLO	PLAINTIFFS' ADMINISTRATIVE	
22	individually and on behalf of all similarly	MOTION TO FILE SUPPLEMENT IN SUPPORT OF THEIR MOTION FOR	
22	situated,	ORDER REQUIRING GOOGLE TO	
23	Plaintiffs,	SHOW CAUSE WHY IT SHOULD	
24	VS.	NOT BE SANCTIONED FOR DISCOVERY MISCONDUCT;	
25		DELCARATION OF MARK C. MAO	
25	GOOGLE LLC,	The Henry 11, C 77, 1	
26	Defendant.	The Honorable Susan van Keulen Courtroom 6 – 4th Floor	
27		Date: April 21, 2022	
27			
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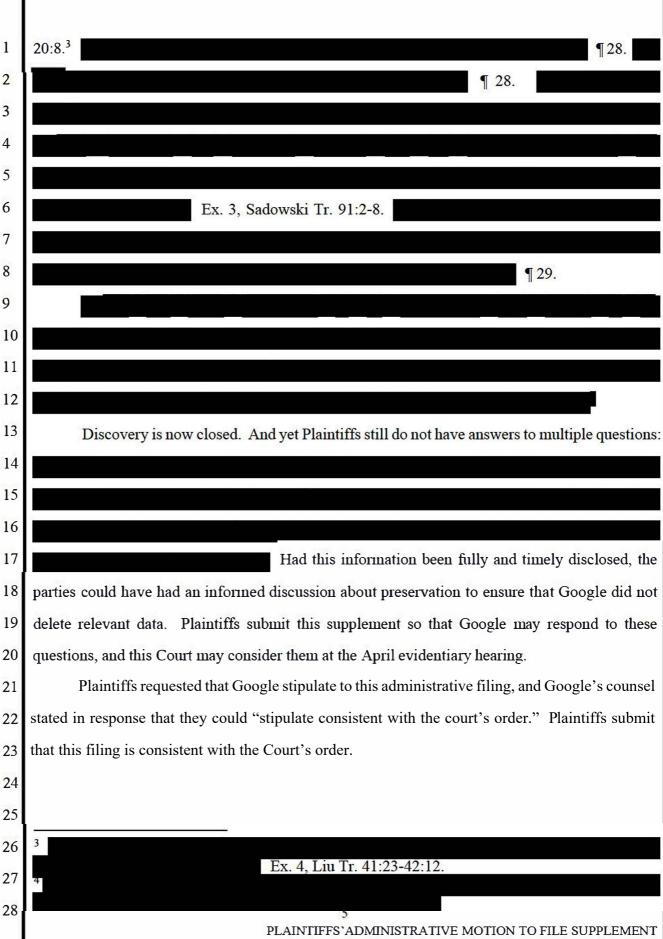
PLAINTIFFS'ADMINISTRATIVE MOTION TO FILE SUPPLEMENT IN SUPPORT OF REQUEST FOR ORDER TO SHOW CAUSE Case No. 4:20-cv-03664-YGR-SVK

1	Pursuant to Local Rule 7-11 and this Court's March 21 Order (Dkt. No. 508), Plaintiffs
2	respectfully submit this administrative motion requesting leave to supplement their motion for
3	sanctions (Dkt. 430) with the material outlined in this five-page motion. The material below
4	consists of recently-discovered evidence showing
5	. Plaintiffs' sanctions motion focused on
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14	further
15	illustrates the severe prejudice caused by Google's pattern and practice of withholding key
16	information regarding identification of private browsing activity, Plaintiffs seek leave to
17	supplement their motion.
18	SUPPLEMENTAL FACTS
19	
20	. ¶ 9.¹
21	
22	
23	. ¶ 10.
24	
25	
26	Except where otherwise noted, all exhibit and paragraph references in this submission are to the
27	Declaration of Mark C. Mao in Support of Plaintiffs' Administrative Motion to File Supplement in Support of Their Request for an Order to Show Cause, which is filed concurrently herewith.
28	1





SUPPLEMENTAL ANALYSIS The Court's November 12 Order was clear. Dkt. 331. Google was required to identify all relevant logs and sources, i.e., "the tools to identify class members using Google's data." Id. at 4. Google's refusal to comply has prejudiced Plaintiffs' ability to obtain and seek preservation of relevant discovery. Plaintiffs' motion for an order to show cause was focused on Google's concealment of the Plaintiffs now seek to supplement with evidence that Google has been See Dkt. 430-21. See Dkt. 430-1 ¶ 19. On March 8, pursuant to this Court's order, Plaintiffs deposed Google employee Mandy Liu, Ex. 4, Liu Tr. 15:2-8. Ex. 4, Liu Tr. 19:24-



PLAINTIFFS'ADMINISTRATIVE MOTION TO FILE SUPPLEMENT IN SUPPORT OF REQUEST FOR ORDER TO SHOW CAUSE Case No. 4:20-cv-03664-YGR-SVK

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